

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION**

LAWRENCE (LARRY) W. SINCLAIR)	
Plaintiff, Pro Se)	
)	Case No. 5:23-CV-109
VS)	
)	
BRIAN MARK KRASSENSTEIN, et al)	
<u>Defendants.</u>)	

UPDATED UNOPPOSED

**PLAINTIFF MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS'
MOTION (DKT 21) TO DISMISS PURSUANT TO RULE 12(b)(6) OF THE FEDERAL
RULES OF CIVIL PROCEDURE, AND IN THE ALTERNATIVE MOTION TO
TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404.**

COMES NOW PLAINTIFF, Lawrence (Larry) W. Sinclair with **UPDATED**
UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND to Defendants
Motion (DKT 21) filed January 30, 2024, and states as follows:

Plaintiff has received and email from Defendants Counsel dated this 2nd day of
February 2024 at 5:31AM advising plaintiff Defendants are UNOPPOSED to plaintiffs
Motion for Extension of Time and requested plaintiff update filing to reflect such.

1. Defendants filed a Motion to Dismiss pursuant to Rule 12(b)(6) of FRCP
claiming plaintiff has failed to state a claim which relief can be granted and a

duplicate Alternative Motion to Transfer Venue on January 30, 2024 (DKT 21) where defendants make numerous claims and defenses.

2. Defendants motion attempts to assert and argue:
 - a. Plaintiff is a Public Figure;
 - b. Plaintiff is a Libel-Proof-Plaintiff;
 - c. Plaintiff cannot prove malice by defendants;
 - d. Defendants did not libel plaintiff;
 - e. Defendants published statements are not libel because they are true;
 - f. Plaintiff supposedly tacitly admitted at some unstated date and time he failed two polygraph tests;
 - g. That the appearance of plaintiff for a Tucker Carlson interview was to create renewed controversy about a former President of the US.
 - h. And many, many others.

Plaintiff is filing this Motion for Extension of Time to respond seeking an additional Thirty (30) days for the current filing deadline for plaintiffs' response now in the interest of conserving time and being able to provide the complete and necessary documentation exhibits and responses to this Court.

No one more than Plaintiff would like to see this action proceed at its fastest possible speed in the interest of justice and in the interest of stopping the rampant online defamation and libel defendants engage in and is using this very action as a means to defame and libel under the guise of defending their actions.

Plaintiff however prefers with the Courts indulgence, to provide actual documentation and records vs using copies or references of other people's published

libel or claims in demonstrating defendants Motion pursuant to Rule 12(b)(6) cannot survive. Plaintiffs only request this additional time for the purpose of obtaining certain documents he still needs to receive from the actual administrators and guarders of said records.

Plaintiff asks this Honorable Court to understand Plaintiff did not bring this action as a jerk knee reaction, and defendants in this action are not the only ones who had been noticed and who are subject to similar action as a result of their defamation and libel. Including the publisher of material defendants inserted in their motion.

Given the weight of the decision before this Court as to defendants Motion plaintiff should be given every reasonable consideration in having the time necessary to ensure plaintiffs response is supported by factual indisputable support and documentation. Granting plaintiff, the requested addition Thirty (30) days in which to file his response does not prejudice defendants in any manner whatsoever while it does provide this Court for the fullest extent of information on which to render its ruling on the motion.

Wherefore Plaintiff respectfully asks this Honorable Court to Grant Plaintiffs Motion for Extension of Thirty (30) Additional Days from the current deadline to file plaintiffs' response setting March 15, 2024, as the deadline for Plaintiff to file his response. Plaintiff assures this Court should he be able to file sooner it will be filed in the soonest time frame possible but not later than March 15, 2024.

Submitted this 2nd day of February 2024

Respectfully Submitted,
Lawrence Sinclair
Lawrence (Larry) W. Sinclair
Plaintiff, Pro Se
Mailing Address
1520 Sherman Street
Laredo, Texas 78040
602-583-3626
Email: lsnewsgroup@gmail.com

CERTIFICATE OF SERVICE

I Lawrence (Larry) W. Sinclair HEREBY certify that a true and correct copy of the foregoing **UPDATED UNOPPOSED PLAINTIFF MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS' MOTION (DKT 21)** has been furnished electronically by email (because Counsel for Defendants has not yet entered his appearance in the courts electronic filing system permitting selection for ECF-CM service) Charles A. Bennett cbennett@bennettlegal.com Counsel for Defendants this 2nd day of February, 2024.

Lawrence Sinclair
Lawrence (Larry) W. Sinclair
Plaintiff, Pro Se
1520 Sherman Street
Laredo, Texas 78040
602-583-3626
Email: lsnewsgroup@gmail.com